

UNITED STATES DISTRICT COURT
DISTRICT OF ALABAMA NORTHERN DIVISION

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WILLIAM P. HACKETT, CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

Robert Lee ALLEN,
PLAINTIFFS,
V.

Case NO. 2:07-CV-85-WKW
Case NO. 2:07-CV-90-ID-WO

SHERIFF WILLIE VAUGHNER, et al.,
Defendants.

Motion For Discovery of UNDISCLOSED INFORMATION
AN MOTION FOR ISSUANCE OF SubPOENA

COMES NOW, PLAINTIFF, Robert Lee ALLEN, PROSE,
AND RESPECTFULLY MOVES this HONORABLE COURT
FOR AN ORDER that A SubPOENA be ISSUED
Addressed to the Lowndes County SHERIFF Department
Willie VAUGHNER, Located At 653 STATE HWY 21
South, Hayneville, AL, 36040-6033, COMMANDING
them to Provide PLAINTIFF A Copy of ALL VIDEO
tapes FROM the Lowndes County DETENTION Facility,
Video SURVAILANCE, FOR these Dates January 16, 2007,
January 21, 2007, January 22, 2007, January 29, 2007, January 30,
2007, AND February 7, 2007. (FOR the whole Jail INSIDE)
AND that All tapes be dated AND label FOR these dates
From 6:00 AM to 6:00 PM for each date listed,

And Produce Radio transmission From Car to dispatch,
And dispatch Audio tapes And dispatch log sheets
Any AND All IN Full For this the day of February 7, 2007
From the hours of 6:00 AM to 6:00 PM From the
Lowndes County SHERIFF Department PLAINTIFF's
Want a Copy of Video surveillance tapes OF LOWNDES
County Detention Facility "SALLY PORT" outside
Videos ON February 7, 2007, From 6:00 AM to 12:00 PM

THE Above name evidence (AND the list below)
And said Materials are Vital to Plaintiff's defense
of this cause. The PLAINTIFF's Cannot Safely go
To A jury Trial without the Above AND below
evidence And Materials, And the Plaintiff does Not
have sufficient Means and is Actually UNable to
pay the Fees ReQuired to have said SubPOENAs
issued as is More Fully Shown IN the PLAINTIFF's
Affidavit that was submitted with said Complaints
filed 1-31-2007 AND 02-02-2007,
PLAINTIFF, Prays that this Honorable Court will
let Him proceed and obtain the ReQuired
listed Materials to prove, And Defend the Alleged
Violation OF His Constitutional Rights that's
Due to him by Law, PLAINTIFF, states Cause AN
Reason in the following:

1.) I want All ORIGINAL Computer printout Copies of the Lowndes County Detention Facility, INmate Jail Bed Roster For these dates of the following MONTHS, August 2ND thru 19th, 2006, August AND January 15th, 2007, thru February 15th, 2007, AND A updated Current INmate Bed Roster Sheet to be mailed to plaintiff within the next 18 days so that Plaintiff can correctly spell witnesses names to send their Interrogatories to them when Plaintiff files his motion with the courts these documents are vital to this cause, and case.

2.) I want the Names And Addresses of All Employee's of the Lowndes County Detention Facility, that worked there from August 1st, 2006 to February 28th, 2007 For Interrogatories purpose's, And to make sure Plaintiff does not misspell or misquote any more names, And for other legal matters that pertain to this cause And case.

3.) I want Copies of All plaintiff's Disciplinary Original

- 4.) I want a list of All employees that worked the dates that plaintiff's ReQuESted Jail Survaliance tapes in Full.
- 5.) I want AN ORDER to produce whatever the Judge rule is permissable in this Motion AND would Allow for good cause And what IS NOT to Be DISReGard.
- 6.) THE Defendant's will in NO way be prejudiced by these ReQuESt

RESPECTFully Submitted.

CERTIFICATE OF SERVICE

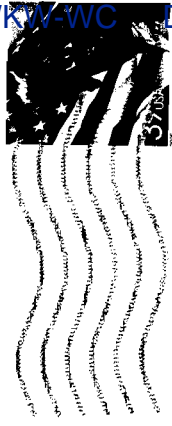
I PROSE, Robert Lee ALLEN Sending A Copy OF the Foregoing MOTION to Defendants Attorney DARYL L MASTERS, by MAILing a Copy OF the SAME IN the UNITED STATES MAIL properly ADDRESSED And with Sufficient postage prepaid, this the 27th day OF MARCH 2007.

Robert Allen
Autauga Jail
136 N. Court Street
Prattville AL, 36067-3002

prose Robert Allen
3-27-2007 Robert Allen

Robert Allen
136 N. Court Street
Prattville AL 36067-3002

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To. MRS. Debra Hackett, Clerk
P.O. Box 711
Montgomery AL 36101-0711

36101-0711

